STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

DAVID P. LITTELL
COMMISSIONER

Barber Foods
Cumberland County
Portland, Maine
A-569-71-K-R/A

Departmental
Findings of Fact and Order
Air Emission License

After review of the air emission license renewal application, staff investigation reports, and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the finds the following facts:

I. REGISTRATION

A. Introduction

Barber Foods of Portland, Maine has applied to renew their Air Emission License, permitting the operation of emission sources associated with their chicken processing equipment. Included in this renewal is a request to route the oven exhaust to the existing scrubber and modify the scrubber's opacity limit. These changes are explained in greater detail in Section II of this renewal license.

B. Emission Equipment

Fuel Burning Equipment List

Equipment	Type of Equipment	Date of Construction	Maximum Capacity (MMBtu/hr)	Fuel Type, %Sulfur	Maximum Firing Rate (i.e. gal/hr)	Stack #
Boiler #1	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Boiler #2	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Boiler #3	Fryers 2 & 4 Oil Heater	Unknown	3.0	Natural Gas	2190 scf/hr	3
Boiler #4	Hot Water Heater	2003	9.0	Natural Gas	9000 scf/hr	4
Boiler #5	Hot Water Heater	2003	9.0	Natural Gas	9000 scf/hr	5
Fryer #1 Oil Heater	Direct Fired Fryer Oil Heater	Unknown	3.0	Natural Gas	3000 scf/hr	F1b
Fryer #3 Oil Heater	Direct Fired Fryer Oil Heater	Unknown	3.0	Natural Gas	3000 scf/hr	F3b
Oven #1 Heater	Direct Fired Heater	Unknown	3.0	Natural Gas	3000 scf/hr	O1b

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Process Equipment List

Equipment	Type of Equipment	Stack #	Primary Control Device
Fryer #1	Canola oil fryer	S1	Scrubber
Fryer #2	Canola oil fryer	S1	Scrubber
Fryer #3	Canola oil fryer	S1	Scrubber
Fryer #4	Canola oil fryer	S1	Scrubber
Oven #1	Oven exhaust	S1	Scrubber
Metal Parts Washer	Parts Washer	n/a	n/a

C. Application Classification

The renewal application for Barber Foods does not include the licensing of increased emissions or the installation of new or modified equipment. The amendment will not increase emissions of any pollutant and will allow the facility to use the wet scrubber for the oven exhaust. Therefore, the license is considered to be a renewal of current licensed emission units combined with an amendment and has been processed through Major and Minor Source Air Emission License Regulations, 06-096 CMR 115 (last amended December 24, 2005).

II. BEST PRACTICAL TREATMENT

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Definitions Regulation, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

Process Description

Barber Foods operates chicken processing equipment to manufacture chicken entrees. Barber currently operates four vegetable oil fryers and one oven in their chicken processing system, which can release volatile organic compounds (VOC) and particulate matter (PM/PM_{10}) emissions.

To support its operations, Barber operates two natural gas-fired Cleaver Brooks fire tube package boilers, two hot water heaters, an indirect oil heater, two direct

fired fryer oil heaters and an oven heater, which release criteria air pollutants. The current fuel use limit is 172,000,000 cubic feet of natural gas per year.

The odor control scrubber removes fine oil mist particulate matter and odor associated with volatile organic compounds (VOC) from chicken frying and cooking operations and was installed in December 2004 to control emissions from Fryers 1, 2, 3, and 4. The scrubber vessel is located on the facility roof. The scrubber utilizes a mixture of water solution containing 1-5% sodium hydroxide and/or 1-5% sodium hypochlorite as the scrubbing medium. The liquid (scrubber recirculation liquid) enters the top of the column through a nozzle, flow countercurrent to the flow of fumes, and then drains into a sump tank for recycle back to the column at a rate of 125 to 150 gallons per minute. The liquid flows by gravity to the scrubber sump tank located in the plant basement where make up water and chemical reagents are added as required. The system is automatically controlled to maintain a pH of 10 to 12. The major source of odor is from odor causing organic compounds from the chicken protein/meat, canola oil, and animal fats and seasonings. The scrubber captures 60-70% of the odor causing organic matter entering the system.

B. Oven Exhaust Rerouted to Wet Scrubber

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Definitions Regulation, 06-096 CMR 100 (last amended December 24, 2005). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

Barber Foods proposes to amend its air license to route exhaust and emissions from their process oven to the existing wet scrubber. The sources of the emissions from the oven are Particulate Matter (PM/PM_{10}) and Volatile Organic Compounds (VOC) consisting of oil mist aerosols generated by heating the canola oil saturated coatings, animal fats and seasonings, and chicken protein/meat. Historically, the exhaust from Oven #1 was controlled by injecting cooling water into the duct prior to passing through centrifugal separators (rotoclones) before discharge to the atmosphere. Because the rotoclones did not adequately capture oil mist aerosols, Barber Foods is requesting through this renewal air license to route emissions to the existing wet scrubber instead.

The scrubber is more effective in controlling PM, VOC and odor emissions. The rotoclones will no longer be used and will be removed from the facility. The wet scrubber achieves about 60-70% control, which greatly reduces emissions from the oven and corresponding odor. The existing wet scrubber on-site was over-

sized when originally installed in 2004 and therefore has the capacity to adequately handle the oven exhaust. Barber Foods did consider other potentially feasible control technologies such as thermal oxidation, biofiltration, and condensation, however, for this relatively small source these technologies are cost prohibitive and do not represent BACT.

The Department has determined the wet scrubber meets BACT for the oven's exhaust. Because the oven exhaust will now be merged with the four fryer exhausts, the current opacity limit of 20% will be increased to 30% as allowed for multiple flue stacks in 06-096 CMR 101 Section 2(B)(5)(a).

C. Existing Equipment

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Boilers, Oil Heaters and Heater

Boilers #1, #2, #3, #4, #5, Fryer #1 Oil Heater, Fryer #2 Oil Heater and Oven #1 Heater each fire natural gas and each have a heat input less than 10.0 MMBtu/hr. None of these units are subject to New Source Performance Standards (NSPS) Subpart Dc. Emissions include combustion pollutants such as Carbon Monoxide (CO), Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), PM, and VOC. Fuel burning equipment at Barber Foods all burn natural gas and have heat input capacities of 9.0 MMBtu/hr or less. Generally, natural gas is considered a clean burning fuel as compared to other fuels (oil, coal, wood, etc.). Based on the relatively small size of the fuel burning units at the facility and the small quantity of potential air emissions, add-on pollution control devices are not economically feasible. Therefore, BPT for fuel burning units at Barber Foods will be to continue firing natural gas. This level of control is consistent with emission controls commonly used for sources of similar age and design in similar industries.

BPT for the Boilers, Oil Heaters and Heater is:

1. Use of 172,000,000 scf of natural gas facility wide.
2. PM and PM_{10} emission limits were based on BPT of 0.01 #/MMBtu.
3. SO_2, NO_x, CO and VOC emission data was based on AP-42 data dated 7/98 for natural gas boilers smaller than 100 MMBtu/hr.

4. Visible emissions from Stack 1, Stack 3, Stack 4 and Stack 5 each shall not exceed an opacity of 10 percent on a six (6) minute block average basis.

Scrubber System

The vents from individual fryer stacks F1a, F2, F3a, F4 and Cooking Oven #1 are combined into a common header before entry into the central packed scrubber system and exhausted through Stack S1. A mesh pad mist eliminator located at the discharge end of the scrubber removes approximately 99% of liquid mist particles greater than 2 microns in size before the gas vents though an induced draft fan and exhaust stack. The scrubber uses a mixture of water solution containing 1-5% sodium hydroxide and/or 1-5% sodium hypochlorite as the scrubbing medium.

Fryer #1, Fryer #2, Fryer #3, Fryer #4 and Cooking exhaust from Oven #1

Fryer #1, Fryer #2, Fryer #3, and Fryer #4 are canola oil fryers, these units emit PM and VOCs. Prior to this renewal air license, the cooking exhaust was separate from the fryers, however, now all units are emitted through the wet scrubber system. Therefore, the emissions from the fryers and oven will be combined and BPT is the following:

1. The use of a wet scrubber system to control PM emissions.
2. MEDEP Regulations 06-096 CMR 105 (General Process Source Particulate Emission Standard) regulates PM limits from these pieces of equipment. However, a combined PM limit of 3.9 lb/hr is BPT for Fryer #1, #2, #3, #4 and oven. This emission rate was based on stack tests and data from similar equipment.
3. BPT for VOC emissions from the fryers and oven is a combined 4.5 lb/hr, based on stack tests and data from similar equipment.
4. Visible emissions from the wet scrubber stack serving the Fryer #1, #2, #3, #4 and cooking oven (S1) shall not exceed 30% on a six (6) minute block average basis, except for no more than three (3) six minute block average in a three hour block period.

Degreaser Unit

The degreaser was manufactured by "PureWash" and uses a solution which is greater than 1% VOC. The unit is approximately 2.5 feet by 3 feet. VOC emissions from the degreaser unit shall not exceed 1.0 ton per year (calendar year basis). Records shall be kept of the type of solvent, percent VOC of the solvent, and the quantity of solvent added and removed. The degreaser will meet the requirements of 06-096 CMR 130.

Facility Emissions

Barber Foods has the following annual emissions, on a calendar year basis, firing no more than:

- 172,000,000 cubic feet of natural gas facility wide.
- Fryers operating 16 hours/day, 5 days/week and 52 weeks/year.

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

	PM	PM_{10}	SO_2	NO_X	CO	VOC
Natural Gas	0.86	0.86	0.05	8.80	7.22	0.47
Fryer 1 Rotoclone	1.66	1.66	--	--	--	2.08
Fryer 2 Rotoclone	1.66	1.66	--	--	--	2.08
Fryer 3 Rotoclone	1.66	1.66	--	--	--	2.08
Fryer 4 Rotoclone	1.66	1.66	--	--	--	2.08
Oven 1 Rotoclone	1.41	1.41	--	--	--	1.04
Parts Washer	--	--	--	--	--	1.00
Total TPY	**8.93**	**8.93**	**0.05**	**8.80**	**7.22**	**11.83**

III. AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

Pollutant	Tons/Year
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on the total facility licensed emissions, Barber Foods is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-569-71-K-R/A subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive

dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]

(5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]

(6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]

(7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]

(8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]

(9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]

(10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

(11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:

1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
2. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
C. submit a written report to the Department within thirty (30) days from date of test completion.

[06-096 CMR 115]

(12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

[06-096 CMR 115]

(13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

(14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]

(15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Boiler #1 and #2**

A. Emissions from each boiler shall not exceed the following [06-096 CMR 115, BPT]:

Boiler #1 and #2 Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.01	0.05
PM_{10}	n/a	0.05
SO_2	n/a	0.01
NO_x	n/a	0.51
CO	n/a	0.43
VOC	n/a	0.03

B. Visible emissions from the stack serving Boiler #1 and #2 (Stack 1) shall not exceed 10% opacity on a six (6) minute block average basis. [06-096 CMR 101]

(17) **Boiler #3**

A. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Boiler #3 Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.01	0.03
PM_{10}	n/a	0.03
SO_2	n/a	0.01
NO_x	n/a	0.29
CO	n/a	0.24
VOC	n/a	0.02

B. Visible emissions from the stack serving Boiler #3 (Stack 3) shall not exceed 10% opacity on a six (6) minute block average basis. [06-096 CMR 101]

(18) **Boiler #4 and #5**

A. Emissions from each boiler shall not exceed the following [06-096 CMR 115, BPT]:

Boiler #4 and #5 Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.01	0.09
PM_{10}	n/a	0.09
SO_2	n/a	0.01
NO_x	n/a	0.87
CO	n/a	0.73
VOC	n/a	0.05

B. Visible emissions from the stacks serving Boiler #4 (Stack 4) and #5 (Stack 5) each shall not exceed 10% opacity on a six (6) minute block average basis. [06-096 CMR101]

(19) **Fryer #1 Oil Heater and Fryer #3 Oil Heater**

A. Emissions from each oil heater shall not exceed the following [06-096 CMR 115, BPT]:

Fryer #1 Oil Heater & Fryer #3 Oil Heater Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.01	0.03
PM_{10}	n/a	0.03
SO_2	n/a	0.01
NO_x	n/a	0.29
CO	n/a	0.24
VOC	n/a	0.02

B. Visible emissions from the stacks serving Fryer #1 Oil Heater (Stack F1b) and Fryer #3 Oil Heater (Stack F3b) each shall not exceed 10% opacity on a six (6) minute block average basis. [MEDEP Chapter 101]

(20) **Oven #1 Heater**

A. Emissions from Oven #1 Heater shall not exceed the following [06-096 CMR 115, BPT]:

Oven #1 Heater Emission Limits

Pollutant	lb/MMBtu	lb/hr
PM	0.01	0.03
PM_{10}	n/a	0.03
SO_2	n/a	0.01
NO_x	n/a	0.29
CO	n/a	0.24
VOC	n/a	0.02

B. Visible emissions from the stack serving Oven #1 Heater (Stack O1b) shall not exceed 10% opacity on a six (6) minute block average basis. [MEDEP Chapter 101]

(21) **Fryer and Cooking Oven #1 Exhaust Emissions**

A. Total emissions from Fryer #1, Fryer #2, Fryer #3, Fryer #4 and Oven #1 shall not exceed the following [MEDEP Chapter 115, BPT]:

Pollutant	lb/hr
PM	3.9
PM_{10}	3.9
SO_2	n/a
NO_x	n/a
CO	n/a
VOC	4.5

B. Emissions from Fryer #1, Fryer #2, Fryer #3, Fryer #4, and Oven shall be controlled by the use of a scrubber system. [06-096 CMR 115, BPT]

C. Visible emissions from the stack serving the scrubber system (Stack S1) shall not exceed 30% on a six (6) minute block average basis, except for no more than three (3) six minute block average in a three hour block period.

[06-096 CMR 101, BPT]

(22) Facility wide fuel use shall be limited to 172,000,000 cubic feet of natural gas, on a calendar year basis. Compliance shall be based on purchase receipts. [06-096 CMR 115, BPT]

(23) **Parts Washer**

A. VOC emissions from the Parts Washer shall not exceed 1.0 ton per year (12-month rolling total). Compliance shall be based on records of the type of solvent, percent VOC of the solvent, and the quantity of solvent added to each parts washer. [06-096 CMR 115, BPT]

B. Parts washers at Barber Foods are subject to Solvent Cleaners, 06-096 CMR 130 (last amended June 28, 2004).
   A. Barber Foods shall keep records of the amount of solvent added to each parts washer. [06-096 CMR 115, BPT]
   B. The following are exempt from the requirements of 06-096 CMR 130 [06-096 CMR 130]:
      1. Solvent cleaners using less than two liters (68 oz) of cleaning solvent with a vapor pressure of 1.00 mmHg, or less, at 20° C (68° F);
      2. Wipe cleaning; and,
      3. Cold cleaning machines using solvents containing less than or equal to 5% VOC by weight.
   C. The following standards apply to cold cleaning machines that are applicable sources under Chapter 130.
      1. Barber Foods shall attach a permanent conspicuous label to each unit summarizing the following operational standards [06-096 CMR 130]:
         (i) Waste solvent shall be collected and stored in closed containers.
         (ii) Cleaned parts shall be drained of solvent directly back to the cold cleaning machine by tipping or rotating the part for at least 15 seconds or until dripping ceases, whichever is longer.
         (iii) Flushing of parts shall be performed with a solid solvent spray that is a solid fluid stream (not a fine, atomized or shower type spray) at a pressure that does not exceed 10 psig. Flushing shall be performed only within the freeboard area of the cold cleaning machine.
         (iv) The cold cleaning machine shall not be exposed to drafts greater than 40 meters per minute when the cover is open.
         (v) Sponges, fabric, wood, leather, paper products and other absorbent materials shall not be cleaned in the degreaser.
         (vi) When a pump-agitated solvent bath is used, the agitator shall be operated to produce no observable splashing of the solvent against the tank walls or the parts being cleaned. Air agitated solvent baths may not be used.

(vii) Spills during solvent transfer shall be cleaned immediately. Sorbent material shall be immediately stored in covered containers.

(viii) Work area fans shall not blow across the opening of the degreaser unit.

(ix) The solvent level shall not exceed the fill line.

2. The remote reservoir cold cleaning machine shall be equipped with a perforated drain with a diameter of not more than six inches. [06-096 CMR 130]

(24) Barber Foods shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 5th DAY OF April , 2010.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

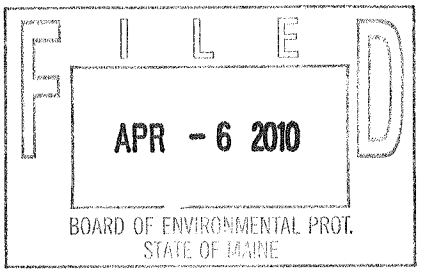
BY: James P. Brooks for
DAVID P. LITTELL, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 18, 2009
Date of application acceptance: October 2, 2009

Date filed with the Board of Environmental Protection:



This Order prepared by Edwin Cousins, Bureau of Air Quality.